

**Main Office****10060 Goethe Road****Sacramento, CA 95827-3553****Tele: [916] 876-6000****Fax: [916] 876-6160****Sacramento Regional Wastewater****Treatment Plant****8521 Laguna Station Road****Elk Grove, CA 95758-9550****Tele: [916] 875-9000****Fax: [916] 875-9068****Board of Directors****Representing:****County of Sacramento****County of Yolo****City of Citrus Heights****City of Elk Grove****City of Folsom****City of Rancho Cordova****City of Sacramento****City of West Sacramento****Stan Dean**  
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October 10, 2012

Ms. Betty Yee

Central Valley Regional Water Quality Control Board

11020 Sun Center Drive, #200

Rancho Cordova, CA 95670

*Via Email to [byee@waterboards.ca.gov](mailto:byee@waterboards.ca.gov)***SUBJECT: 2013 Triennial Review for the Sacramento River and San Joaquin River Basins**

Dear Ms. Yee:

The Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to provide comments as part of the Triennial Review of the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). The Clean Water Act's triennial review process is critical to ensure maintenance and amendment of the Basin Plan as necessary to achieve the highest water quality that is reasonably attainable. Given the importance of the basin planning process to achieve water quality objectives, wastewater agencies, industry, agriculture, the State and Regional Water Boards and other stakeholders must all work together to find creative solutions for updating this Basin Plan. Our commitment to stakeholder processes is demonstrated by our participation in the coordinated control study effort of the Mercury TMDL implementation, a funding partner in the Central Valley Drinking Water Policy Workgroup, and participation in CV-SALTS over the last five years. We also are working with the Regional Water Board staff to develop a Delta regional monitoring program that will provide meaningful data for future basin plans amendments.

In general, SRCSD agrees with the prioritization effort of this triennial review. We are requesting one clarification under Issue Number 5: Delta Issues. The Delta Stewardship Council September 25, 2012, Draft Delta Plan recommends the preparation and implementation of a study plan for development of nutrient objectives in this triennial review period, not the development and implementation of nutrient criteria for the Delta. Without a good understanding of what level of nutrients the ecosystem needs to be sustainable, the consequences of developing and quickly implementing nutrient criteria could be substantial. The Draft Delta Plan additionally recommends that studies needed for the development of criteria be completed by 2016, within this triennial review time period. Therefore, we would like for the status to reflect the development of a study plan for criteria development, as the Draft Delta Plan recommends.

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SRCSO supports the comments submitted by the Central Valley Clean Water Association for the Sacramento River and San Joaquin River Basins and urges the Regional Water Board to address these issues before the next triennial review. SRCSD encourages the Regional Water Board to carefully prioritize the issues and look for creative ways to work with concerned stakeholders to ensure that these issues actually are addressed before the next triennial review.

Thank you for your consideration. Please contact me at (916) 876-6030 or [dornl@sacsewer.com](mailto:dornl@sacsewer.com) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Dorn", is positioned above the printed name.

Linda Dorn  
Environmental Program Manager

Cc: Prabhakar Somavarapu, Director of Policy and Planning  
Terrie Mitchell, Legislative and Regulatory Affairs Manager  
Robert Seyfried, Senior Civil Engineer  
Jason Lofton, Associate Civil Engineer